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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

CENTURY-NATIONAL INSURANCE
 COMPANY, a California corporation, PACIFIC
 PIONEER INSURANCE GROUP, INC., a
 Delaware corporation, PACIFIC PIONEER
 INSURANCE COMPANY, a California
 corporation, and UCA GENERAL
 INSURANCE SERVICES, a California
 corporation,

Plaintiffs,

v.

DOUGLAS J. GARDNER, ESQ., an individual,
 DOUGLAS J. GARDNER, LTD., a Nevada
 domestic professional corporation, Rands &
 SOUTH, LTD., a Nevada domestic
 professional corporation, ALPS PROPERTY &
 CASUALTY INSURANCE COMPANY, a
 Montana corporation, DOES 1 through 20,
 inclusive.

Defendants.

CASE NO.: 2:18-cv-02090-APG-VCF

**STIPULATION AND ORDER TO
 EXTEND TIME TO FILE
~~PROPOSED~~ STIPULATION AND
 ORDER FOR DISMISSAL OF THE
 GARDNER DEFENDANTS'
 CLAIMS**

(SECOND REQUEST)

Plaintiffs, CENTURY-NATIONAL INSURANCE COMPANY, PACIFIC PIONEER
 INSURANCE GROUP, INC., PACIFIC PIONEER INSURANCE COMPANY, and UCA
 GENERAL INSURANCE SERVICES ("Plaintiffs") and Defendants, DOUGLAS J.
 GARDNER, ESQ., DOUGLAS J. GARDNER, LTD, and Rands & South, LTD.

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1 (“Gardner Defendants”), by and through their respective counsel, hereby agree and
2 stipulate as follows:

3 Whereas, at the Settlement Conference held on August 24, 2022 before
4 Magistrate Judge Cam Ferenbach, the parties agreed that the claims between Plaintiffs
5 and the Gardner Defendants have settled, while the remaining claims will proceed on
6 the normal litigation track.

7 Whereas, the Court initially ordered that the proposed stipulation and order for
8 dismissal of the Gardner claims must be filed on or before September 28, 2022.

9 Whereas, on September 28, 2022 and pursuant to the Stipulation between
10 Plaintiffs and the Gardner Defendants, the Court issued an Order to Extend Time to File
11 Proposed Stipulation and Order for Dismissal of the Gardner Defendants’ Claims up to
12 October 12, 2022.

13 Whereas, due to the need for additional time to thresh out certain matters and
14 fully finalize the terms of the settlement agreement among themselves, Plaintiffs and the
15 Gardner Defendants have again agreed to request the Court for extension of time of
16 additional fourteen (14) days from the current deadline, to file their proposed stipulation
17 and order for dismissal of the Gardner claims.

18 WHEREFORE, it is hereby AGREED AND STIPULATED TO by and between
19 Plaintiffs and the Gardner Defendants that the submission of the proposed stipulation
20 and order for dismissal of the Gardner claims shall be extended for another period of
21 fourteen (14) days from its current due date of October 12, 2022, to **Wednesday,**
22 **October 26, 2022.**

23 This is the parties’ second request for extension and is their way of
24 accommodating each other. The parties certify that this Stipulation is made in good faith
25 and is not sought for the purpose of undue delay or to cause prejudice to any party.

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1 IT IS SO STIPULATED.

2 DATED this 12th day of October, 2022.

3 PYATT SILVESTRI

LIPSON NEILSON P.C.

4 /s/ James P.C. Silvestri

/s/ Joseph P. Garin

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8 and

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14 *Attorneys for Plaintiffs Century-National
15 Insurance Company, Pacific Pioneer
16 Insurance Group, Inc., Pacific Pioneer
17 Insurance Company, and
18 UCA General Insurance Services*

19 IT IS SO ORDERED.

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21 Cam Ferenbach
22 United States Magistrate Judge

23 DATED 10-25-2022
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